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February 16, 2018

Honorable William H. Pauley, III
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Hughes v. Twenty-First Century Fox, Inc. et al., Case No. 1:17-cv-07093
(SDNY)(WHP) Letter-Request to File a Brief on Constitutionality of Local
Law

Dear Judge Pauley:

I write on behalf of the City of New York (the "City") for permission to file a brief defending the constitutionality of NYC Administrative Code §§ 8-903, 8-904. This local law provides a civil cause of action for a person "claiming to be injured by an individual who commits a crime of violence motivated by gender" Ad. Code §8-904. A "crime of violence motivated by gender" is defined to mean "a crime of violence committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim's gender." Ad. Code §8-903 (b). The City was served with a "Notice of Constitutional Challenge Pursuant to N.Y.C.P.L.R. 1012(b)(2)" on February 6, 2018, pursuant to which attorneys for Mr. Charles Payne, a defendant in this case, notified the City that his motion to dismiss the amended complaint involves the constitutionality of a local law.

The City requests permission to file a brief, no more than ten pages, defending the constitutionality of this law, by March 16, 2018.

Respectfully submitted,



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Cc: All Counsel of Record (by ECF and email)

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